

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

JERMAINE BILLIE

PLAINTIFF,

v.

CASE NO. 2:25-cv-00861

**CREDENCE RESOURCE
MANAGEMENT, LLC**

DEFENDANT.

**CREDENCE RESOURCE MANAGEMENT, LLC'S MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

COMES NOW, Credence Resource Management, LLC ("CRM"), defendant in the above-styled and numbered cause, by and through undersigned counsel, and submits this motion for an extension of time to respond to the Complaint filed by Plaintiff Jermaine Billie ("Plaintiff") and states:

1. On or about February 14, 2025, Plaintiff filed his Complaint in the above numbered and captioned matter. (Doc. 1). CRM was served with the Summons and a copy of the Complaint on May 19, 2025. CRM's responsive pleading is currently due on June 9, 2025.

2. CRM recently retained undersigned counsel who is in the process of identifying, collecting, and reviewing relevant information and documents, and preparing an appropriate response to the Complaint. CRM requests a 21-day extension so that it has sufficient time to complete its initial investigation and properly respond to the Complaint.

3. Counsel for CRM has conferred with Plaintiff regarding the requested extension, and Plaintiff refused consent to an extension of time, advising he is opposed to any extension.

4. CRM has not requested and has not been granted any prior extensions of its responsive pleading deadline in this action.

5. A Case Management Plan has not been issued, and the requested extension does not affect any other case deadlines.

6. Additionally, D. Jay Davis, Jr. is headed out of the country on vacation on Monday, June 9, 2025, and requests additional time to finalize the responsive pleading upon his return.

7. This extension is being requested so that justice may be done and not in any way for the purpose of delay. Granting the relief sought herein will not prejudice any party and will save time and costs of the parties and the Court.

WHEREFORE, Credence Resource Management, LLC, respectfully requests the Court grant this motion and extend for 21 days, until June 30, 2025, the time within which CRM may plead or otherwise response to the Complaint.

Dated: June 6, 2025

Respectfully Submitted,

/s/ D. Jay Davis, Jr.
D. Jay Davis, Jr. (Fed. I.D. No. 6723)
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*Counsel for Defendant,
Credence Resource Management, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2025, a copy of the foregoing was electronically filed with the Clerk of the Court, United States District Court for the Southern District of South Carolina, Columbia Division and served USPS to the following:

**Jermaine Billie
355 Bradley Bend Drive
Moncks Corner, Berkeley SC 29461**

CLEMENT RIVERS, LLP

/s/ D. Jay Davis, Jr.